

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>TYLER ERDMAN,</p> <p style="text-align: right;"><i>Plaintiff,</i></p> <p style="text-align: center;"><i>-against-</i></p> <p>ADAM VICTOR and THE BOARD OF MANAGERS OF MANHATTAN PLACE CONDOMINIUM,</p> <p style="text-align: right;"><i>Defendants</i></p> <p>.</p>	<p style="text-align: center;">Case No.: 1:20-cv-04162-LGS</p> <p style="text-align: center;">NOTICE OF MOTION TO SEAL</p> <p style="text-align: center;">ORAL ARGUMENT REQUESTED</p>
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PLEASE TAKE NOTICE THAT, upon the attached Memorandum of Law and the accompanying Affirmation of John F. Whelan, and the exhibits attached thereto, Defendant Adam Victor (“Victor”), by his attorneys, Schlam Stone & Dolan LLP, will move before the Honorable Lorna G. Schofield at the United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and at a time to be set by this Court, for an order sealing Paragraph 48 of the Amended Complaint and replacing it on the docket with appropriate redactions, and granting such other and further relief to Defendant Adam Victor as the Court deems just. Oral argument is requested. Pursuant to Paragraph 5.A of the Court’s Special Rules and Practices in Civil *Pro Se* Cases, any opposition hereto must be filed on or by January 4, 2021, and any reply hereto must be filed within two weeks of receipt of opposition papers.

Dated: December 4, 2020
New York, NY

Schlam Stone & Dolan LLP

By: /s/ John F. Whelan

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